

IN THE UNITED STATES DISTRICT COURT
FOR THE DELAWARE OF DELAWARE

EPIC TECH, LLC,

Plaintiff,

v.

Civil Action No. 1:23-cv-00118-RGA

VGW LUCKYLAND, INC., and
VGW HOLDINGS US, INC.,

Defendants.

DECLARATION OF THOMAS M. HUH

1. My name is Thomas M. (“Tim”) Huhn. I am competent in all respects to testify regarding the matters set forth herein. I am a private investigator licensed by the State of Georgia. My Georgia Private Detective License Number is PDE14639. I am the President of T.M. Huhn LLC. My primary business address is 390 Sweet Ivy Lane, Lawrenceville, Georgia 30043. Prior to opening my own investigative agency, I was a Special Agent with the Federal Bureau of Investigation.

2. In March, 2023, I was hired by Epic Tech, LLC (“Epic Tech”) to assist its attorneys in investigating the revenue being generated by an online gambling website located at www.luckylandslots.com (the “Website”).

3. On February 28, 2023, attorney Kelly O. Wallace (“Wallace”), outside counsel for Epic Tech, LLC (“Epic Tech”) sent me an e-mail with the URL for the Website and instructed me to create an account on the website, log in, and purchase “Sweeps Coins” with my credit card.

4. On March 1, 2023, I created a user account on the Website.

5. On March 2, 2023, I used my Barclays Bank (“Barclays”) credit card ending in number 4399 to purchase \$4.99 of “Sweeps Coins” from the website.

6. A true and correct copy of the transaction I obtained from my credit card issuer’s online website is attached hereto as Exhibit A-1.

7. I have authorized Epic Tech’s attorneys to request, via subpoena, any and all available additional information that Barclays may have regarding my transaction.

I certify that all of the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to the penalties of 28 U.S.C. § 1746 (including perjury) relating to unsworn declarations to authorities.

This 28TH day of MARCH, 2023.



Thomas M. Huhn
T. M. Huhn LLC
390 Sweet Ivy Lane
Lawrenceville, GA 30043